



Signed and Filed: December 9, 2020

DENNIS MONTALI
U.S. Bankruptcy Judge

WEIL, GOTSHAL & MANGES LLP
Theodore Tsekerides (*pro hac vice*)
(theodore.tsekerides@weil.com)
Jessica Liou (*pro hac vice*)
(jessica.liou@weil.com)
Matthew Goren (*pro hac vice*)
(matthew.goren@weil.com)
767 Fifth Avenue
New York, NY 10153-0119
Tel: 212 310 8000
Fax: 212 310 8007

KELLER BENVENUTTI KIM LLP
Tobias S. Keller (#151445)
(tkeller@kbbkllp.com)
Peter J. Benvenutti (#60566)
(pbenvenutti@kbbkllp.com)
Jane Kim (#298192)
(jkim@kbbkllp.com)
650 California Street, Suite 1900
San Francisco, CA 94108
Tel: 415 496 6723
Fax: 650 636 9251

*Attorneys for Debtors and Reorganized
Debtors*

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In re:

PG&E CORPORATION,

- and -

PACIFIC GAS AND ELECTRIC COMPANY,

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

** All papers shall be filed in the Lead Case,
No. 19-30088 (DM).*

Case No. 19-30088 (DM)
Chapter 11
(Lead Case)
(Jointly Administered)

**ORDER APPROVING
STIPULATION ENLARGING
TIME FOR JACK STAFFORD ET
AL. TO FILE PROOFS OF CLAIM**

1 The Court having considered the *Stipulation Enlarging Time for Jack Stafford et al. to*
2 *File Proofs of Claim*, dated December 8, 2020 [Dkt. No. 9764] (the “**Stipulation**”),¹ entered into
3 by PG&E Corporation (“**PG&E Corp.**”) and Pacific Gas and Electric Company (the “**Utility**”),
4 as debtors and reorganized debtors (collectively, the “**Debtors**” or the “**Reorganized Debtors**”)
5 in the above-captioned cases (the “**Chapter 11 Cases**”), on the one hand, and Jack Stafford, Bo
6 Nealon, Sienna Nealon, Kenleigh Vierra, Kiernan Vierra, Alexis Honighausen, Elena
7 Honighausen, Roisin Lafferty, Sinead Lafferty, and Michelle Shao (collectively, the “**Movants**”),
8 on the other hand; and pursuant to such Stipulation and agreement of the Parties, and good cause
9 appearing,

10 IT IS HEREBY ORDERED THAT:

- 11 1. The Stipulation is approved.
- 12 2. The Proofs of Claim are deemed timely filed.
- 13 3. The Proofs of Claim and Asserted Fire Victim Claims shall for all purposes be treated
14 and classified as Fire Victim Claims under the Plan, and shall be fully assumed by, and the sole
15 responsibility of, the Fire Victim Trust and subject to the Channeling Injunction, to be administered,
16 processed, settled, disallowed, resolved, liquidated, satisfied, and/or paid in accordance with the Fire
17 Victim Trust Agreement and the Fire Victim Claims Resolution Procedures. Movants shall have no
18 further recourse against the Debtors or Reorganized Debtors, as applicable, with respect to the
19 Proofs of Claim or the Asserted Fire Victim Claims.
- 20 4. Nothing herein shall be construed to be a waiver by the Debtors or the Reorganized
21 Debtors, as applicable, the Fire Victim Trust, or any other party in interest of any right to object to
22 the Asserted Fire Victim Claims or the Proofs of Claim on any grounds other than the untimely
23 filing thereof.
- 24 5. Nothing herein shall be construed to be a waiver by Movants of their rights to oppose
25 any asserted challenge to the Asserted Fire Victim Claims or the Proofs of Claim.

26
27 ¹ Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them
28 in the Stipulation.

1 6. By entry of this Order, the *Motion to Allow/Deem Timely Late Filing of Proofs of*
2 *Claim* [Dkt. No. 9680] and the *Amended Motion to Allow/Deem Timely Late Filing of Proofs of*
3 *Claim* [Dkt. No. 9719] are deemed withdrawn with prejudice, and the Hearings are vacated.

4 7. The Stipulation is binding on the Parties and each of their successors in interest.

5 8. The Stipulation constitutes the entire agreement and understanding of the Parties
6 relating to the subject matter thereof and supersedes all prior agreements and understandings relating
7 to the subject matter thereof.

8 9. This Court shall retain jurisdiction to resolve any disputes or controversies arising
9 from the Stipulation or this Order.

10 *** END OF ORDER ***

11
12 Dated: December 8, 2020

13 ABBEY, WEITZENBERG,
14 WARREN & EMERY PC

15 /s/ Brendan M. Kunkle

16 Brendan M. Kunkle, Esq.

17 Attorneys for Jack Stafford, Bo Nealon, Sienna
18 Nealon, Kenleigh Vierra, Kiernan Vierra, Alexis
19 Honighausen, Elena Honighausen, Roisin
20 Lafferty, Sinead Lafferty, and Michelle Shao